

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

Katherine M. Cleary, *et al.*,
Individually and on behalf of
others similarly situated.

Plaintiffs,

vs.

American Airlines, Inc.,

Defendants.

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Civil Action No. 4:21-cv-00184

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE
REPLY IN SUPPORT OF MOTION FOR AN ORDER CERTIFYING A CLASS**

Plaintiffs file this Unopposed Motion for an Extension of Time to file a Reply in Support of Motion for an Order Certifying a Class, and respectfully submit the following to this Court:

1. On May 19, 2021, the Court set the following schedule for briefing on Plaintiffs' Motion for Class Certification: Motion due June 11, 2021, Opposition due June 25, 2021, and Reply due July 2, 2021.

2. Plaintiffs filed their Motion on June 11th and Defendant filed its Opposition on June 25. Plaintiffs respectfully request a one week extension to file their Reply and leave to file a brief no longer than 15 pages.

3. AA's brief in opposition to class certification raises several issues, both factual and legal, that require reply. In addition to arguing that Plaintiffs fail to satisfy the requirements of Rule 23, AA makes arguments regarding contract formation, statute of limitations, and waiver. With regards to Rule 23, AA primarily argues that individual factual issues predominate. Plaintiffs' response will need to provide the factual record (established to date) necessary for the Court to assess that argument.

4. The stakes at class certification are high – if the Court denies Plaintiffs’ Motion for Class Certification, the case is unlikely to continue. Accordingly, Plaintiffs request additional time and pages to reply to AA’s numerous defenses.

5. Defendant American Airlines, through its counsel, does not oppose this request.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs respectfully ask this Honorable Court to grant this motion and allow the Plaintiffs until July 9, 2021, to file their Reply in Support of Their Motion for Class Certification and permit Plaintiffs to file a Reply Memorandum of Law of no longer than 15 pages.

Dated: June 28, 2021

Respectfully submitted,

By: /s/ Mark Alexander

Mark Alexander

State Bar No. 01007500

MARK A. ALEXANDER, P.C

5080 Spectrum Drive, Suite 850E

Addison, Texas 75001

Telephone: (972) 544-6968

Facsimile: (972) 421-1500

mark@markalexanderlaw.com

By: /s/ Oren S. Giskan

Oren S. Giskan (*pro hac vice*)

GISKAN SOLOTAROFF &

ANDERSON LLP

90 Broad Street, 10th Floor

New York, NY 10004

Telephone: (212) 847-8315

Facsimile: (646) 964-9610

ogiskan@gslawny.com

Attorneys for Plaintiffs

CERTIFICATE OF CONFERENCE

Plaintiffs' counsel has conferred with Defendant's counsel who has stated that he is unopposed to this motion.

Date: June 28, 2021.

/s/ Oren Giskan
Oren Giskan

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was served upon all counsel of record via the Court's CM/ECF system on this 28th day of June 2021.

/s/ Oren Giskan
Oren Giskan